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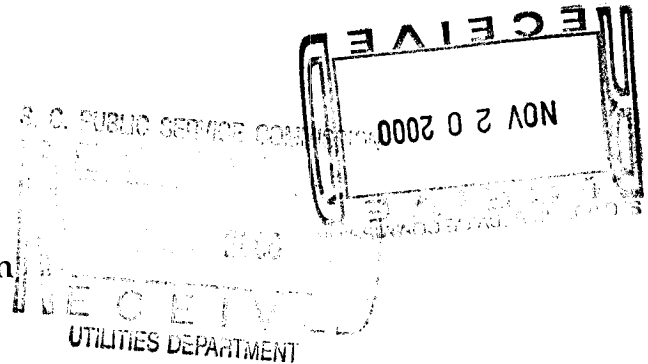
AREA CODE 803  
TELEPHONE 252-3300  
TELECOPIER 256-8062

\*ALSO ADMITTED IN NC  
\*\*ALSO ADMITTED IN TX

November 20, 2000

**VIA HAND DELIVERY**

The Honorable Gary E. Walsh  
Executive Director  
South Carolina Public Service Commission  
Post Office Drawer 11649  
Columbia, SC 29211



RE: Application of Chem-Nuclear Systems, LLC, a Division of GTS  
Duratek, Inc., for Identification of Allowable Costs. SCPSC Docket  
No. 2000-366-A.

Dear Mr. Walsh:

Enclosed for filing are the original and ten copies of the Petition to Intervene of South Carolina Electric and Gas Company in the above matter. I would appreciate your acknowledging receipt of these documents by date-stamping the extra copy enclosed and returning it to me via the courier.

By copy of this letter I am serving each party of record with a copy of the petition. If you have any questions or if you need any additional information, please do not hesitate to contact me.

Sincerely,

**WILLOUGHBY & HOEFER, P.A.**

*B. Craig Collins*  
B. Craig Collins

BCC/smv  
Enclosure

The Honorable Gary E. Walsh  
November 20, 2000  
Page 2

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cc: parties of record  
Catherine D. Taylor, Esquire

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INTERVENOR  
#1 (DB)

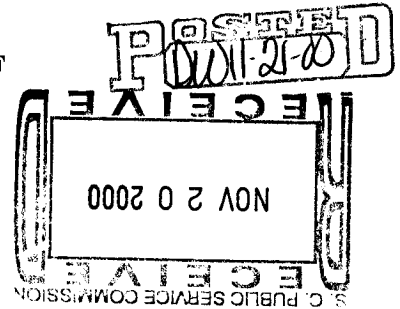
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BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

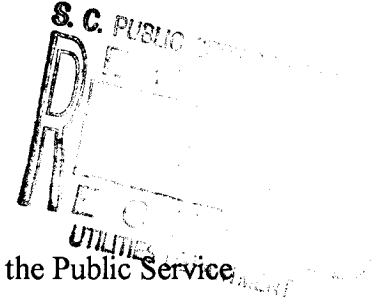
Docket No. 2000-366-A



IN RE:

Application of Chem-Nuclear Systems, LLC,  
a Division of GTS Duratek, Inc., for Identification  
of Allowable Costs.

PETITION TO  
INTERVENE



South Carolina Electric and Gas Company ("SCE&G") hereby petitions the Public Service Commission of South Carolina ("the Commission"), pursuant to Regulation 103-836(A)(3) and other applicable provisions of the Commission's Rules of Practice and Procedure, for permission to intervene in the above-captioned proceeding. In support of this petition, SCE&G would respectfully show as follows:

1. SCE&G is a corporation organized and existing under the laws of the State of South Carolina and is a public utility subject to the regulatory authority of the Commission pursuant to Title 58 of the Code of Laws of South Carolina. The address for SCE&G's headquarters is 1426 Main Street, Columbia, South Carolina 29201.

2. SCE&G's representatives in this proceeding are as follows:

Catherine D. Taylor  
Office of General Counsel  
SCANA Corporation  
1426 Main Street, 13th floor  
Columbia, South Carolina 29201  
Telephone: (803) 217-9356  
Fax: (803) 217-7931

RETURN DATE: 01/06

SERVICE: 01/06

Mitchell Willoughby  
B. Craig Collins  
Willoughby & Hoefer, P.A.  
1022 Calhoun Street, Suite 302  
PO Box 8416  
Columbia, South Carolina 29202-8416  
Telephone: (803) 252-3300  
Fax: (803) 256-8062

3. The above-captioned proceeding involves the request of Chem-Nuclear Systems, LLC, a Division of GTS Duratek, Inc. (“Chem-Nuclear”), to identify, pursuant to Section 48-46-40(B)(1) of the Atlantic Interstate Low-Level Radioactive Waste Compact Implementation Act (“the Act”), its allowable costs for operating the regional low-level radioactive waste disposal facility located near Barnwell, South Carolina.

4. As a generator of low-level radioactive waste disposed of at Chem-Nuclear’s Barnwell facility, SCE&G has a direct and material interest in the issues to be addressed and resolved by the Commission in this docket. SCE&G is therefore entitled to participate in this proceeding as a party of record pursuant to Section 48-46-40(B)(9) of the Act.

5. SCE&G has not developed a position in this matter, but reserves the right to modify, amend, or expand its position during the course of this proceeding.

6. SCE&G is informed and believes that granting its request is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing SCE&G’s views and concerns can be developed.

WHEREFORE, SCE&G prays for the following relief:

(a) That this Petition to Intervene be accepted by the Commission and that SCE&G be made a formal party of record to the proceeding;

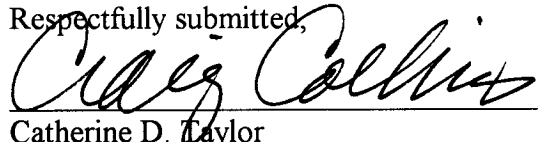
(b) That SCE&G be allowed to participate in this proceeding and to take such positions as it deems advisable;

(c) That SCE&G be provided copies of all filings, pleadings, testimony, and exhibits in this proceeding; and

(d) That such other and further relief be granted as is just and proper.

November 20, 2000

Respectfully submitted,



Catherine D. Taylor  
Office of General Counsel  
SCANA Corporation  
1426 Main Street, 13th floor  
Columbia, South Carolina 29201  
Telephone: (803) 217-9356

Mitchell Willoughby  
B. Craig Collins  
Willoughby & Hoefer, P.A.  
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(803) 252-3300

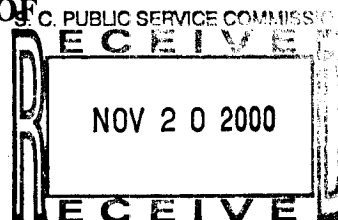
Attorneys for South Carolina Electric and  
Gas Company

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**BEFORE THE**  
**PUBLIC SERVICE COMMISSION OF**

**SOUTH CAROLINA**

**Docket No. 2000-366-A**



IN RE:

Application of Chem-Nuclear, LLC,  
a Division of GTS Duratek, Inc., for  
Identification of Allowable Costs.

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one (1) copy of the **Petition to Intervene**, on behalf of South Carolina Electric & Gas Company by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

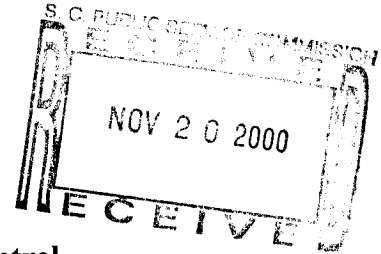
Robert T. Bockman, Esquire  
**McNair Law Firm**  
P.O. Box 11390  
Columbia, SC 29211 ✓

Mr. Regan E. Voit, President  
**Chem-Nuclear Systems** ✓  
140 Stoneridge Drive  
Columbia, SC 29210

Mr. Richard W. Kelly, Executive Director  
**South Carolina Budget and Control Board**  
P.O. Box 12444  
Columbia, SC 29211 ✓

Mr. Philip S. Porter, Consumer Advocate  
**State of South Carolina** ✓  
P.O. Box 5757  
Columbia, SC 29250-5757

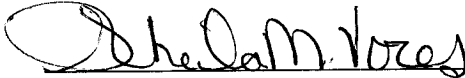
Mr. Charles W. Condon, Attorney General  
**State of South Carolina**  
P.O. Box 11549  
Columbia, SC 29211 ✓



Mr. Douglas E. Bryant, Commissioner  
**SC Department of Health & Environmental Control**  
2600 Bull Street  
Columbia, SC 29201 ✓

Mr. Benjamin A. Johnson, Chairman  
**Atlantic Compact Commission**  
P.O. Drawer 12070 ✓  
Rock Hill, SC 29731

Kevin A. Hall, Esquire  
**Nelson, Mullins, Riley & Scarborough, LLP**  
P.O. Box 11070  
Columbia, SC 29211

  
Sheila M. Vores

Columbia, South Carolina  
This 20th day of November, 2000

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